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SYB, LLC dba Golden Heart Senior Care*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KALIAH BURNETT,
Plaintiff,

vs.

GTLV LLC, dba GOLDEN HEART SENIOR
CARE, a domestic Limited-Liability
Company; DOES 1 through 20, inclusive;
ROE CORPORATIONS, 1 through 20,
inclusive,

Defendants.

Case No. 2:20-cv-00029-APG-BNW

**STIPULATION AND ORDER TO (1)
DISMISS GTLV LLC dba GOLDEN
HEART SENIOR CARE WITH
PREJUDICE, (2) ADD DEFENDANT
SYB, LLC dba GOLDEN HEART
SENIOR CARE AS THE PROPER
DEFENDANT, and (3) AMEND THE
CASE CAPTION**

Defendant SYB, LLC dba Golden Heart Senior Care, misnamed as GTLV LLC dba Golden Heart Senior Care, and Plaintiff Kaliah Burnett, by and through their respective counsel of record, hereby stipulate as follows:

Plaintiff was employed by Defendant SYB, LLC dba Golden Heart Senior Care, but erroneously named her former employer as “GTLV LLC dba Golden Heart Senior Care.” In the interest of judicial economy, and to avoid the unnecessary time and cost of motion practice regarding this issue, the parties have agreed to correct this mistake by dismissing the mistakenly named incorrect entity, “GTLV LLC dba Golden Heart Senior Care,” and adding in as the proper party SYB, LLC dba Golden Heart Senior Care, Plaintiff’s prior employer.

1 Defendant SYB, LLC dba Golden Heart Senior Care waived the service requirement and
2 will file its responsive pleading on or before February 11, 2020 in accordance with the parties'
3 prior stipulation. *See* ECF No. 12. Thus, the parties have stipulated to the following:

4 1. That Defendant GTLV LLC dba Golden Heart Senior Care be dismissed from this
5 action with prejudice;

6 2. That Defendant SYB, LLC dba Golden Heart Senior Care be named as the proper
7 Defendant, undersigned counsel having been authorized to accept service of Plaintiff's Complaint
8 against Defendant SYB, LLC dba Golden Heart Senior Care and file its responsive pleading on its
9 behalf on or before February 11, 2020;

10 3. That the caption be revised to reflect that the entity identified as "GTLV LLC dba
11 Golden Heart Senior Care" shall be stricken from the caption; and

12 4. That the caption be revised to reflect the addition of "Defendant SYB, LLC dba
13 Golden Heart Senior Care" as the properly named Defendant.

14 This stipulation is submitted and based upon the following:

15 1. Defendant SYB, LLC dba Golden Heart Senior Care was Plaintiff's employer and
16 is the proper Defendant in this action. As such, there is good cause for dismissing GTLV LLC
17 dba Golden Heart Senior Care, adding Defendant SYB, LLC dba Golden Heart Senior Care as the
18 proper Defendant, and for correcting the caption;

19 2. Defendant SYB, LLC dba Golden Heart Senior Care has authorized its
20 undersigned counsel to accept service of the Complaint on its behalf (to avoid any additional cost
21 to Plaintiff or delay), and file its responsive pleading on its behalf on February 11, 2020;

3. This request is made in good faith, in the interest of judicial economy and to save the Parties the time and expense of motion practice to name the proper Defendant and correct the caption, and is not for the purpose of delay.

Dated this 6th of February, 2020.

KANG & ASSOCIATES, PLLC

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*Attorneys for Defendant
SYB, LLC dba Golden Heart Senior Care*

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
Dated: February 6, 2020.

4830-0332-3827, v. 1